

## Document Log Item

<b>Addressing</b>	
<b>From</b>	<b>To</b>
Carmen Santos/R9/USEPA/US	"Conlan, Linda" <Linda.Conlan@amec.com> "Conlan, Linda" <Linda.Conlan@amec.com>
<b>CC</b>	<b>BCC</b>
<b>Description</b> <span>Form Used: Reply</span>	
<b>Subject</b>	<b>Date/Time</b>
RE: PCBs: Pechiney Site	04/28/2010 04:33 PM
<b># of Attachments</b>	<b>Total Bytes</b>
0	12,779
<b>NPM</b>	<b>Contributor</b>
<b>Processing</b>	
<b>Comments</b>	

Body

### Document Body

Hello, Linda:

Thank you for the information. I will keep you inform of approval progress.

Regards,  
Carmen

Carmen D. Santos, Project Manager  
RCRA Corrective Action Office  
Waste Management Division  
USEPA Region 9  
415.972.3360  
fax: 415.947.3533

"Conlan, Linda" ---04/28/2010 11:00:50 AM---Good morning Carmen; Below is the additional information for the last two items discussed during our

From: "Conlan, Linda" <Linda.Conlan@amec.com>  
To: Carmen Santos/R9/USEPA/US@EPA  
Date: 04/28/2010 11:00 AM  
Subject: RE: PCBs: Pechiney Site

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Good morning Carmen;

Below is the additional information for the last two items discussed during our April 2<sup>nd</sup> call (soil volumes and proposed certification language).

**1. Soils containing PCBs at 2,000 ppm.**

PCBs were detected at a concentration of 2,000 mg/kg at a depth of 20.5 to 21.5 feet in the Phase IIB Area, former Building 104, at soil borings 40 and 95 as shown on the attached figure (extracted from Figure 9 of the application). These borings are within the proposed removal area 4a for soil within the upper 15 feet (soil below 15 feet will remain in place) Based on the soil removal goal of 35 mg/kg for the upper 15 feet, PCB-impacted soil in this area is proposed for removal to a depth of about 12 feet (shored excavation at 40 feet x 50 feet x 12 feet = 900 in-place cubic yards of soil). Soil containing PCBs at a concentration of 2,000 mg/kg below the soil removal depth of 12 feet is approximately 800 in-place cubic yards and will be left in place as proposed in our application. Once soil removal is completed and confirmation sampling confirms that the soil removal goal has been met, a 6-inch concrete mushroom cap will be placed at the base of the excavation over the underlying PCB-impacted soil. A coloring pigment can also be added to the concrete as a visual indicator of its presence. In addition, the excavated area/concrete will be surveyed and documented in the land use covenant for the property.

**2. Certification for Application.**

A proposed modified to the certification language is attached for your review and consideration.

Please give me a call if you need any additional information.

Thank you,

**Linda Conlan, PG | Senior II Geologist**  
**AMEC Geomatrix, Inc.**

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**From:** Conlan, Linda

**Sent:** Friday, April 09, 2010 3:59 PM

**To:** Santos.Carmen@epamail.epa.gov

**Subject:** RE: PCBs: Pechiney Site

Carmen;

Thank you for providing the key summary points of our call. I added just a few additional [\(notes\)](#) below.

Regards,

**Linda Conlan, PG | Senior II Geologist**  
**AMEC Geomatrix, Inc.**

**From:** Santos.Carmen@epamail.epa.gov [mailto:Santos.Carmen@epamail.epa.gov]

**Sent:** Monday, April 05, 2010 10:12 AM

**To:** Conlan, Linda

**Subject:** PCBs: Pechiney Site

**Importance:** High

Hello, Linda:

Thank you for the opportunity to talk with you on Friday April 2, 2010 concerning the Pechiney site. This message memorializes some high points of our conversation. In addition, I am confirming receipt of your April 2, 2010 electronic message transmitting electronic files containing AMEC's Amendments 2 and 3 to the 2009 PCB risk-based disposal application (Application) for the Pechiney site.

During our April 2, 2010 conversation we went over some issues regarding Pechiney:

**3. Soils containing PCBs at 2,000 ppm.** Soils containing PCBs at 2,000 ppm are present at the site at about 20 to 21 feet bgs. AMEC is going to estimate the volume and size of the area at the site containing soils with this PCB concentration. AMEC plans on submitting a proposal on how to dispose of these soils on-site. A colored concrete barrier may be considered. USEPA will consider AMEC / Pechiney's proposal during approval of the Application for the Pechiney site.

**(On-site re-use of the crushed concrete with PCBs containing less than 5.3 mg/kg – AMEC is considering the addition of a colored dye to this material as a visual indicator of its presence, and the potential placement of a layer (0.5 to 1 foot thick) of crushed concrete containing less than 1.0 mg/kg of PCBs on top of this colored material.)**

**2. Land use.** The land use for the site is industrial / commercial and the City of Vernon's plans do not include changes in that land use zoning. Specific immediate land uses for redevelopment of the Pechiney site (may) exclude for

now the proposed power plant; and the fire training center is a lower priority for redevelopment of the site. Redevelopment of the site may include office facilities associated with commercial / industrial activity. Land uses may involve any kind of commercial / industrial use ([including that which is similar to the land use of the surrounding area or former manufacturing operations](#)).

**3. Certification for Application.** AMEC and Pechiney have concerns about the Certification language required by USEPA for the PCB cleanup Application given other parties different than Pechiney and AMEC have conducted investigatory and remedial work at the Pechiney site. AMEC will send a proposed modified certification language for USEPA review.

**4. USEPA approval of the Pechiney Application.** I have estimated about two to three weeks to complete review of the Application and Amendments. Although not discussed during our conversation, I plan on getting the approval of the Application signed and transmitted to AMEC / Pechiney by the end of April 2010. That approval is likely to be a conditional approval.

Please let me know if this message contains any inaccuracies concerning our April 2, 2010 dialogue.

Thank you for your courtesies and have a nice day.

Regards,  
Carmen

Carmen D. Santos, Project Manager  
RCRA Corrective Action Office  
Waste Management Division  
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fax: 415.947.3533

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